

VIA E-MAIL AND U.S. MAIL

Elizabeth Akehurst-Moore, Chair
Zoning Board of Appeals
Town of Concord
141 Keyes Road, Concord, MA 01742

March 10, 2021

**RE: 246 Old Road to Nine Acre Corner
Concord Country Club – Special Permit Application**

Dear Chair Akehurst-Moore, and Members of the Board:

As residents of Williams Road, many longstanding, we are writing in opposition to the proposed construction of the expansive and massive 3+ million gallon plastic lined irrigation water holding reservoir that the applicant is proposing on a site that relates to our road and homesteads.

The immense project would require extensive earthwork, moving thousands of truckloads of soil to make major changes to contours and topography. The project in this site would require carving into the 50 foot high slope on the back side of Concord Country Club property that faces Williams Road, and constructing a long, tall (up to 30+ feet) steep berm to retain the large quantity of irrigation water proposed to be held.

These drastic alterations to the landscape will be permanent, harmful, incongruous with surroundings, resource demanding, and are unnecessary.

The proposed steep high berm would run parallel to Williams Road and be devoid of trees and unsightly, as well as visible from the road and properties - removing and replacing the natural slope of the previously existing forested hills with one engineered with design considerations focused solely on maximizing water capacity of the reservoir due to site limitations.

The project as proposed requires additional tree removal, which in aggregate, including clearing already undertaken, totals over 4+ acres of mature woodland (an area the size of 3 football fields). This forested area provided natural screening, and a valuable buffer to the course property - in an area in close proximity to residents properties, the Jenny Dugan Brook and its surrounding wetlands.

No mitigation whatsoever has been proposed, due diligence and detailed impact assessments have not been carried out for a multitude of critical issues, such as drainage and evaporation - despite the immense scale, complexity, and potential consequences of design flaws or mismanagement.

As a result, it is clear that there were no design considerations for addressing adverse effects of this project and associated risks relating to this location, and how it would negatively impact our neighborhood, public interest, and the natural environment for generations to come.

With the few changes the applicant has proffered, the entire project remains unjustified, excessive and non-compliant.

We support the recommendation by the NRC as well as the suggestion of DPW/Engineering regarding engaging a third-party review, and believe it is critical that a peer review be conducted by an independent environmental engineering and science firm that is selected by the Town and paid for by the applicant. This review should evaluate alternative locations (including the one identified by the applicant which is located on the playing area itself), and consider alternative means for achieving the water needs for the course – including alternative irrigation options and sites, and especially a No Build option and sustainable turf management methods.

There are countless examples of golf courses throughout the world prioritizing and taking a leadership position in finding innovative and creative ways to balance community and environmental implications with course needs, and designing solutions to mitigate the environmental and aesthetic impacts of their land and water needs. The Concord Country Club previously made formal commitments to such initiatives with a focus on sustainability, but they have not upheld those priorities in any respect for this project.

The Town of Concord and its residents deserve better. We urge the ZBA to recognize the feedback from the community regarding the impacts and irreversible damage this project will cause if it proceeds in this location.

Thank you for your consideration,

Williams Road Residents
(see below)

PROPOSED SITE DETAILS:

This site is in an area that consisted of a serene mature forest on a sloped hillside that served as a natural, functional, attractive buffer between the playing areas of the golf course, the Jennie Dugan Brook and open wetlands below, and Williams Road and houses along it.

- Over the years many have expressed appreciation for the natural beauty and appeal of this gently winding country road, which contains woodlands, farmlands, and connects with the rail trail and the important and historic Jennie Dugan stream (which runs under Williams Road) and its associated watershed and natural habitats. These are attributes that make Williams Road and Concord special and unique - and contribute to the character, feel, and desirability of the neighborhood.
- Although much of the proposed reservoir would be on the back side of the applicants property, and is treated as such from the perspective of the applicant - the elevation, location, design and drastic changes proposed to the slope and topography of the site - combined with the removal of screening of the site, ensure that the impacts from this project will be conspicuous to residents of Williams Road for the long term, from yards, patios, porches and windows, as well as to the numerous walkers, bikers and others who frequent this popular route.

PROJECT DETAILS:

The volume of proposed water storage is as large as area town reservoirs, as noted by the DPW, and this is an unusual and very complex undertaking - the proposed size and capacity has not been justified with any data provided by the applicant.

It is suggested that the benefit to the applicant of this 3+ million gallon storage is that it will allow faster watering of the course, particularly during times of drought - but the real (and potential) costs are significant :

- The extensive earthwork will require the removal of thousands of truckloads of soil in order to carve out the hillside and construct a massive 30+ foot steep and unsightly berm near the edge of the Jenny Dugan brook/wetlands - serving as an unnatural backdrop to the brook and surrounding natural habitats. This represents the opposite of attractive land utilization.
- The expansive surface area and footprint, combined with the shallow pond required due to site limitations, will create many pond management and environmental issues in this sensitive area and those surrounding it. This results in an ongoing maintenance concern that residents have no control over, but will be affected by on an ongoing basis, in perpetuity.
- This project involves the clearcutting of over 4 acres of forest and removal of all extensive tree cover and vegetation - an area the size of 3 football fields- on the edge of a sensitive wildlife area. The impact of this deforestation is wide ranging and severe.

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